

Honorable Judge Barbara J. Rothstein

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VINETA and MICHAEL GALLOGLY, a
marital community,

Plaintiffs,

v.

FOREMOST INSURANCE COMPANY
GRAND RAPIDS, MICHIGAN, a Michigan
corporation,

Defendant.

Case No. 2:24-cv-00817-BJR

STIPULATED MOTION AND ORDER
EXTENDING DISCOVERY DEADLINES

I. STIPULATED MOTION

The parties in this matter stipulate and agree to move the Court for another Order modifying the Court's case scheduling order (Dkt. No. 10) and Stipulated Order Extending Discovery Deadlines, Expert Deposition Deadline and dispositive motions deadline for filing. (Dkt. No. 12).

A scheduling order may be modified "for good cause and with the judge's consent." Fed. R. Civ. P. 16(b)(4). Good cause exists for the requested continuance.

This request is necessitated by delays in the testing of several ruptured pipes, pipe connectors and the BackerBoard behind the shower, which are critical pieces of evidence in this matter. The testing has concluded and the parties have exchanged Expert Reports, and scheduled

1 a mediation for Friday, March 14, 2025.

2 Accordingly, pursuant to the agreement between the parties, the undersigned counsel for
3 Plaintiff and Defendant respectfully request that the Court extend certain deadlines in this case as
4 follows:

5 Completion of Fact Discovery: From February 14, 2025 to April 4, 2025.

6 Completion of Expert Discovery: From February 14, 2025 to April 4, 2025.

7 Expert Depositions: From March 21, 2025 to April 18, 2025.

8 All dispositive motions must be filed: From March 28, 2025 to May 9, 2025.

9 Both parties have agreed that an extension of the deadlines is appropriate and necessary,
10 as the mediation should allow the parties to resolve the case short of incurring the expenses
11 involved with additional fact and expert discovery, as well as dispositive motion practice prior to
12 trial.

13 Dated: February 10, 2025

ROPERs MAJESKI PC

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15 By: /s/ Joanne T. Blackburn

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18 *Counsel for Defendant Foremost Insurance
Company Grand Rapids, Michigan*

19 Dated: February 10, 2025

LAW OFFICE OF WILLIAM E. PIERSON, JR. PC

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21 By: /s/ William E. Pierson, Jr.

22 William E. Pierson, Jr., WSBA #13619

23 *Counsel for Plaintiffs Vineta and Michael
Gallogly*

II. ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Discover deadlines are modified as follows:

Completion of Fact Discovery: From February 14, 2025 to April 4, 2025.

Completion of Expert Discovery: From February 14, 2025 to April 4, 2025.

Expert Depositions: From March 21, 2025 to April 18, 2025.

All dispositive motions must be filed: From March 28, 2025 to May 9, 2025.

DATED this 10th of February 2025.



Hon. Barbara J. Rothstein
United States District Court Judge